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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M 11-959**

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18 U.S.C. § 1546)

SATHYANARAYANA OLLAPURAM,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JOHN NUNEZ, being duly sworn, deposes and states that he is an Enforcement Officer with United States Customs and Border Protection ("CBP"), duly appointed according to law and acting as such.

Upon information and belief, on or about September 23, 2011, within the Eastern District of New York, the defendant SATHYANARAYANA OLLAPURAM, did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.


1. My information comes from a joint investigation of the Department of State and CBP. I have spoken with other CBP agents, interviewed the defendant and reviewed documents.

2. On September 23, 2011, the defendant SATHYANARAYANA OLLAPURAM arrived at John F. Kennedy International Airport on Qatar Airways Flight 83 from Doha, Qatar. Upon arrival, the defendant presented a valid Indian passport, No. J2203417, in his own name. The passport contained a B1/B2 visa, Visa Foil No. C7887835.

3. After presenting his passport, the defendant SATHYANARAYANA OLLAPURAM was referred to inspection by CBP because a computer database indicated he may have obtained his visa fraudulently. When he applied for the visa in India, the defendant had stated that he worked for a web development company and sought to come to the United States to meet a client. During the course of his CBP inspection, the defendant ~~was unable to~~ could not elaborate on the purpose of his visit and could not answer basic questions regarding computers, information technology, website development, and the nature of his work. He also admitted that he did not have a degree in any computer field. When asked to explain these discrepancies, he admitted that he did not work in the computer field and had come to the United States to work unlawfully as a waiter in a restaurant in Richmond, Virginia.

4. The defendant SATHYANARAYANA OLLAPURAM was then notified of his Miranda rights, which he waived. The defendant SATHYANARAYANA OLLAPURAM then stated, in sum and substance, that the purpose of his trip was to resume unlawful employment at a restaurant in Richmond, Virginia; he had paid approximately 50,000 rupees for false documentation necessary to obtain a visa to the United States, had previously worked at said restaurant, and had been invited to return.

WHEREFORE, your deponent respectfully requests that the defendant SATHYANARAYANA OLLAPURAM be dealt with according to law.

  
JOHN NUNEZ  
Enforcement Officer  
United States Customs and Border  
Protection

Sworn to before me this  
24<sup>th</sup> day of September, 2011